

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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: UNITED STATES OF AMERICA : SEALED INDICTMENT  
: :  
: - v. - : 20 Cr.  
: :  
: JUAN ROJAS, and :  
: JOSE MEJICANOS, :  
: :  
: Defendants. :  
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COUNT ONE  
**20 CRIM 130**  
(Narcotics Conspiracy)

The Grand Jury charges:

1. From at least in or about December 2019, through in or about February 13, 2020, in the Southern District of New York and elsewhere, JUAN ROJAS and JOSE MEJICANOS, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JUAN ROJAS and JOSE MEJICANOS, the defendants, would and did distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that JUAN ROJAS and JOSE MEJICANOS, the defendants, conspired to distribute and possess with the intent to distribute was 5 kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

**FORFEITURE ALLEGATION**

4. As a result of committing the offense alleged in Count One of this Indictment, JUAN ROJAS and JOSE MEJICANOS, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

**Substitute Assets Provision**

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

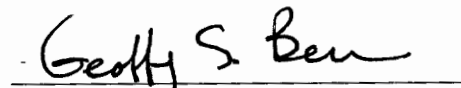
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

  
FOREPERSON

  
GEOFFREY S. BERMAN  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES OF AMERICA

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Defendants.

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SEALED INDICTMENT

20 Cr.

(21 U.S.C. § 846.)

GEOFFREY S. BERMAN  
United States Attorney

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Foreperson

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TRUEBILL, SEALED INDICTMENT,  
- (2) ARREST WARRANTS  
- MS LEHBERGER 2/14/20 